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7	
8	UNITED STATES DISTRICT COURT
9	NORTHERN DISTRICT OF CALIFORNIA
10	
11	ELIZABETH FREI,) CASE NO.: 05-1191 EDL
12	D1: 4:00
13	Plaintiff,) STIPULATION AND [PROPOSED]
14	ORDER FOR FILING OF AMENDED COMPLAINT AND TO TAKE DEFENDANT HARTEODE
15	vs. TO TAKE DEFENDANT HARTFORD LIFE INSURANCE COMPANY'S MOTION FOR SUMMARY
16) MOTION FOR SUMMARY) JUDGMENT OFF CALENDAR
17	HARTFORD LIFE INSURANCE) COMPANY and DOES 1 through 200,) Inclusive,)
18	Defendants.
19)
20	
21	IT IS HEREBY STIPULATED by and between the parties hereto, through their respective
22	attorneys of records, that the Credit Suisse First Boston Corporation long term disability plan and
23	underlying insurance policy issued by Hartford Life Insurance Company through which Plaintiff
24	seeks to recover benefits in this action is a plan governed by the Employee Retirement Income
25	Security Act of 1974 ("ERISA"). As such, the parties request Defendant Hartford Life Insurance
26	Company's Motion for Summary Judgment on the grounds of ERISA preemption, which is
27	scheduled for hearing on September 27, 2005, be taken off calendar.
28	IT IS FURTHER STIPULATED that Plaintiff may file an Amended Complaint asserting
	-1- STIPULATION AND [PROPOSED] ORDER FOR FILING OF
	,

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1	an ERISA cause of action for recovery of benefits pursuant to 29 U.S.C. § 1132(a)(1). A copy of
2	Plaintiff's amended complaint is filed herewith. Defendant will file a response within 20 days
3	from the entry of the Court's order allowing such amendment.
4	
5	Dated: September 5, 2005 SCOLINOS, SHELDON & NEVELL
6	
7	By <u>/S/</u> *Todd F. Nevell
8	Attorneys for Plaintiff,
9	ELIZABETH FREI
10 11	
12	Dated: September 5, 2005 SEDGWICK, DETERT, MORAN & ARNOLD, LLP
13	
14	By <u>/S/</u> Michelle McIsaac
15	Attorneys for Defendant, HARTFORD LIFE INSURANCE COMPANY
16	
17	* I hereby attest that I have on file all holograph signatures for any signatures indicated by a "conformed" signature (/S/) within this efiled document.
18	
19	IT IS SO ORDERED.
20	IT IS SO ORDERED
21	DATE:
22 23	September 7, 2005 UNITED STATES DISTRICT COURT JUDGE
24	
25	
26	
27	
28	
	-2- STIPULATION AND [PROPOSED] ORDER FOR FILING OF AMENDED COMPLAINT